

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE INTERROGATORIES  
PR/USPS-T1-13(b) THROUGH (e)  
(August 15, 2011)**

The United States Postal Service hereby objects to subparts (b)-(e) of Public Representative interrogatory PR/USPS-13, dated August 5, 2011.

**PR/USPS-T1-13**

Please provide a version of USPS-LR-1 that, for each postal retail facility under consideration for discontinuance, identifies:

- (a) If the facility is co-located with a BMEU
- (b) If the facility is co-located with a city carrier delivery unit
- (c) If the facility is co-located with a rural carrier delivery unit
- (d) If the facility is co-located with a mail processing facility
- (e) If the facility currently provides any mailers with exceptional dispatch service.
- (f) How many Post Office boxes are currently:
  - (1) Located at the facility
  - (2) Rented at the facility

Subparts (b) through (e) seek information related to postal operations irrelevant to the Retail Access Optimization Initiative. Subparts (b), (c) and (e) seek information regarding carrier delivery operations that may or may not be co-located at facilities subject to the RAO Initiative. The initiative under review in this docket does not affect the delivery of mail by city or rural carriers, either on a regular or expedited basis. It is also irrelevant if a retail location being analyzed under RAO is co-located with a mail processing plant or some other mail processing facility. Accordingly, the Postal Service objects to providing the information requested by these subparts of PR/USPS-13.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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